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WIDE MERCHANT INVESTMENT, INC.,
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BLUE COAST SERVICE, INC.
DAVID BOEM JOON KIM

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

BRANDON CALLIER, an individual,

Plaintiff,

vs.

WIDE MERCHANT INVESTMENT, INC., a
dissolved California corporation, WIDE
MERCHANT HOLDINGS, INC., a Nevada
corporation, BLUE COAST SERVICE, INC., a
Nevada corporation, and DAVID BOEM JOON
KIM, an individual,

Defendants.

Case No. 2:24-CV-10131-MEF-JC

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF DEFENDANTS' REPLY IN
SUPPORT OF MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

[Reply in Support of Motion to Dismiss
Plaintiff's First Amended Complaint]

Date: August 14, 2025
Time: 10:00 A.M.
Judge: Hon. Maame Ewusi-Mensah
Frimpong

REQUEST FOR JUDICIAL NOTICE

Defendants Wide Merchant Investment, Inc., Wide Merchant Holdings, Inc., Blue Coast Service, Inc., and David Boem Joon Kim (collectively “Defendants”) respectfully request that the Court take judicial notice of the following fact pursuant to Rule 201 of the Federal Rules of Evidence.

Request for Judicial No. 1: Plaintiff has filed one hundred fifty-one (151) federal cases, primarily in the Western District of Texas, against various companies alleging claims under the Telephone Consumer Protection Act. Attached hereto as Exhibit 1 is a printout from PACER of the records of those filed actions.

DATED: June 26, 2025

BUCHALTER
A Professional Corporation

By:



GABRIEL G. GREEN
ARTIN BETPERA
ELAINE Y. CHENG

Attorneys for Defendants
WIDE MERCHANT INVESTMENT, INC.
WIDE MERCHANT HOLDINGS, INC.
BLUE COAST SERVICE, INC.
DAVID BOEM JOON KIM

BN 90835394

CERTIFICATE OF SERVICE

I, declare that I am an employee of Buchalter, a Professional Corporation, located at 1000 Wilshire Boulevard, Suite 1500, Los Angeles, CA 90017. I am over the age of eighteen years and not a party to this action or proceeding.

On **June 26, 2025**, I caused the following document(s): **REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANTS' REPLY IN SUPPORT OF MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT** to be served on all other parties and/or their attorney(s) of record to this action by ☒ electronically serving ☐ faxing and/or ☒ placing a true copy thereof in a sealed envelope as follows::

Brandon Callier
1490 A George Dieter Drive
Unit 174
El Paso, TX 79936

☒ **BY MAIL** I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service. The address(es) shown above is(are) the same as shown on the envelope. The envelope was placed for deposit in the United States Postal Service at Buchalter in Los Angeles, California on **June 26, 2025**. The envelope was sealed and placed for collection and mailing with first-class prepaid postage on this date following ordinary business practices.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. Executed on **June 26, 2025**, at Los Angeles, California.

Deborah L. Brown

/s/ Deborah L. Brown
(Signature)